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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
(Newark Vicinage)**

MARYLAND CASUALTY COMPANY

Plaintiff,

v.

RATAN, LLC d/b/a Howard Johnson North
Bergen, RATAN GROUP HOTEL, LLC d/b/a
Comfort Inn, GOVAN, LLC d/b/a Starlite
Motel, RATGOVAN, LLC d/b/a Days Inn
Ridgefield, NJ, MAGRAT, LLC d/b/a Red
Carpet Inn, NAVRATAN, LLC d/b/a Red
Carpet Inn, RATAN GROUP II HOTELS,
LLC d/b/a Knights Inn Newark Airport
Elizabeth, RATAN HOSPITALITY GROUP,
LLC d/b/a Howard Johnson Express Inn -
Parsippany, McSAM MANAGEMENT, LLC
d/b/a Days Inn Brooklyn, RUXMAN, LLC
d/b/a Comfort Suites, G.I.F. CORPORATION
d/b/a Econo Lodge, RATAN HOTELS
MANAGEMENT, LLC d/b/a Howard
Johnson Inn Clifton, NJ, RATAN HOTEL
PLAZA, LLC d/b/a Ramada East Orange,
RATAN R PARK, LLC d/b/a Ramada
Rochelle Park, RATAN MT. OLIVE, LLC
d/b/a Days Inn Budd Lake, RATAN
RONKONKOMA, LLC d/b/a Rodeway Inn
McArthur Airport, RATAN BAY SHORE,
LLC d/b/a Red Carpet Inn Bay Shore,
RATAN SMITHTOWN, LLC d/b/a
America's Best Value Inn, PATERSON

Civil Docket No. 2:14-CV-03596-SDW

STIPULATION

H OTEL, LLC d/b/a Rodeway Inn Paterson, CAPRI LITTLE FERRY, LLC d/b/a The Capri Inn, RATAN PALACE, LLC d/b/a Holiday Inn Express, North Bergen (formerly the Palace Hotel), SEVEN HOTELS, LLC d/b/a Towne House Inn & Suites, RATAN NEWBURG, LLC d/b/a Ramada Inn Newburgh/West Point, RATAN REALTY, LLC d/b/a Hampton Inn, McSAM BROOKLYN, LLC d/b/a Days Inn Long Island City, 49 STREET SAI, LLC d/b/a Sleep Inn, NEWARK HOSPITALITY GROUP, LLC d/b/a SpringHill Suites Newark Liberty International Airport, and RATAN NEWARK, LLC d/b/a Howard Johnson Hotel - Newark Airport,

Defendants.

IT IS HEREBY STIPULATED AND AGREED UPON by the undersigned, attorneys for parties herein, that:

1. Plaintiff Maryland Casualty Company withdraws, without prejudice, its pending motion for default judgment as to all defendants named herein;


2. Defendants Ratan, LLC d/b/a Howard Johnson North Bergen, Ratan Group Hotel, LLC d/b/a Comfort Inn, Govan, LLC d/b/a Starlite Motel, Ratgovan, LLC d/b/a Days Inn Ridgefield, NJ, Magrat, LLC d/b/a Red Carpet Inn, Navratan, LLC d/b/a Red Carpet Inn, Ratan Group II Hotels, LLC d/b/a Knights Inn Newark Airport Elizabeth, Ratan Hospitality Group, LLC d/b/a Howard Johnson Express Inn -Parsippany, McSam Management, LLC d/b/a Days Inn Brooklyn, Ruxman, LLC d/b/a Comfort Suites, G.I.F. Corporation d/b/a Econo Lodge, Ratan Hotels Management, LLC d/b/a Howard Johnson Inn Clifton, NJ, Ratan Hotel Plaza, LLC d/b/a Ramada East Orange, Ratan R Park, LLC d/b/a Ramada Rochelle Park, Ratan Mt. Olive, LLC d/b/a Days Inn Budd Lake, Ratan Ronkonkoma, LLC d/b/a Rodeway Inn McArthur Airport, Ratan Bay Shore, LLC d/b/a Red Carpet Inn Bay Shore, Ratan Smithtown, LLC d/b/a America's

Best Value Inn, Paterson Hotel, LLC d/b/a Rodeway Inn Paterson, Capri Little Ferry, LLC d/b/a The Capri Inn, Ratan Palace, LLC d/b/a Holiday Inn Express, North Bergen (formerly the Palace Hotel), Seven Hotels, LLC d/b/a Towne House Inn & Suites, Ratan Newburg, LLC d/b/a Ramada Inn Newburgh/West Point, Ratan Realty, LLC d/b/a Hampton Inn, McSam Brooklyn, LLC d/b/a Days Inn Long Island City, 49 Street Sai, LLC d/b/a Sleep Inn, Newark Hospitality Group, LLC d/b/a SpringHill Suites Newark Liberty International Airport, and Ratan Newark, LLC d/b/a Howard Johnson Hotel - Newark Airport will file an Answer to Plaintiff's Complaint no later than September 29, 2014; and

3. In filing said Answer, Defendants waive any and all defenses enumerated in Fed. R. Civ. P. 12(b)(2-5), and submit to the jurisdiction of this Court.

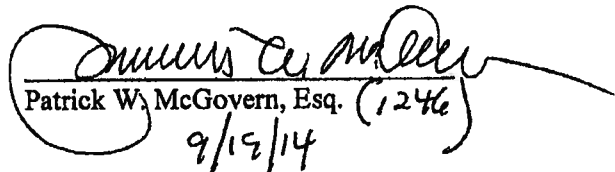
Dated: September 19, 2014

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Plaintiffs



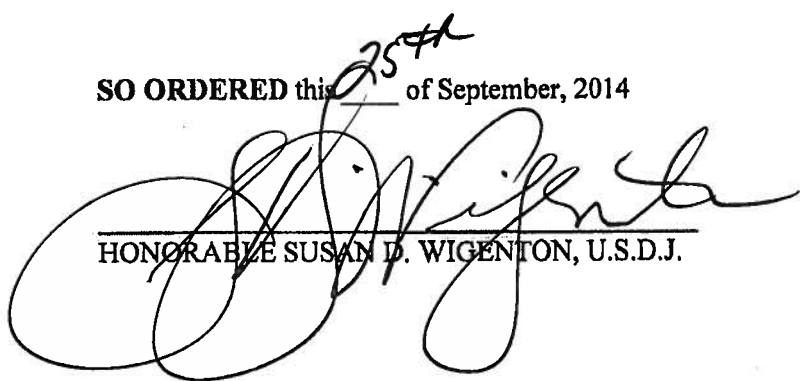
Evan Yablonsky, Esq.

**GENOVA BURNS GIAN TOMASI
WEBSTER LLC**
Attorneys for Defendants



Patrick W. McGovern, Esq. (1246)
9/19/14

SO ORDERED this 25th of September, 2014



HONORABLE SUSAN D. WIGENTON, U.S.D.J.